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UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF
CAMILA TAPERNOUX IN SUPPORT
OF DEFENDANTS UBER
TECHNOLOGIES, INC. AND
OTTOMOTTO LLC'S TRIAL BRIEF**

Trial Date: December 4, 2017

1 I, Camila Tapernoux, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney with
3 Morrison & Foerster LLP, counsel of record for Defendants Uber Technologies, Inc. and
4 Ottomotto LLC (collectively “Uber”) in this action. I am admitted to practice before this Court. I
5 submit this declaration in support of Uber Technologies, Inc. and Ottomotto LLC’s Trial Brief. I
6 make this declaration based on personal knowledge. If called as a witness, I could and would
7 testify competently to the matters set forth herein.

8 2. Attached hereto as Exhibit 1 is a true and correct copy of an email from
9 Arturo González, counsel for Uber, to Andrea Roberts, counsel for Waymo, and others dated
10 November 15, 2017.

11 3. Attached hereto as Exhibit 2 is a true and correct copy of an email from
12 Andrea Roberts, counsel for Waymo, to Arturo González, counsel for Uber, and others dated
13 November 15, 2017.

14 4. Attached hereto as Exhibit 3 is a true and correct copy of Plaintiff Waymo LLC’s
15 Initial Disclosures served on April 3, 2017.

16 5. Attached hereto as Exhibit 4 is a true and correct copy of Plaintiff Waymo LLC’s
17 Supplemental Initial Disclosures served on June 21, 2017.

18 6. Attached hereto as Exhibit 5 is a true and correct copy of Plaintiff Waymo LLC’s
19 Corrected Supplemental Initial Disclosures served on June 22, 2017.

20 7. Attached hereto as Exhibit 6 is a true and correct copy of Plaintiff’s Responses and
21 Objections to Ten Interrogatories Selected Pursuant to Order Granting in Part Motion to Compel
22 Interrogatory Responses, Dkt. 1173 (No. 28) served on August 24, 2017.

23 8. Attached hereto as Exhibit 7 is a true and correct copy of Plaintiff’s Third
24 Supplemental Objections and Responses to Uber’s Third Set of Interrogatories (No. 13) served on
25 August 24, 2017.

9. Attached hereto as Exhibit 8 is a true and correct excerpt of Plaintiff's Objections and Responses to Uber's First Set of Interrogatories (Nos. 1-11) served on June 16, 2017.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 21st day of November, 2017 at San Francisco, California.

/s/ Camila Tapernoux
Camila Tapernoux

ATTESTATION OF E-FILED SIGNATURE

I, Arturo J. González, am the ECF User whose ID and password are being used to file this Declaration. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Camila Tapernoux has concurred in this filing.

Dated: November 21, 2017

/s/ Arturo J. González
 Arturo J. González